

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Raymond J. McGlone and Kelly L. McGlone	:	Chapter 13
Debtor	:	Case No.: 17-15760

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MOTION TO RECONSIDER THE MARCH 21, 2019 ORDER DISMISSING THE  
CHAPTER 13 CASE AND MOTION TO MODIFY THE CHAPTER 13 PLAN AFTER  
CONFIRMATION

Come Now, Raymond J. McGlone and Kelly L. McGlone, hereinafter referred to as "Debtors" and move this Honorable Court to vacate its March 21, 2019 Order Dismissing in the instant matter and Motion to Modify the Chapter 13 Plan and in support thereof aver the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about August 25, 2017.
2. The Chapter 13 bankruptcy matter was assigned case number 17-15760.
3. The Chapter 13 Plan was confirmed by this Honorable Court on February 22, 2018.
4. On or about February 21, 2019 the Chapter 13 Trustee filed a Motion to Dismiss the instant matter for failure to make timely and regular Chapter 13 payments.
5. In or about February, 2019 the Debtors relocated from 1393 Arundel Way, Bensalem, PA to 4313 Deer Path Lane, Philadelphia, PA.
6. A Praeclipe to Change address will be filed contemporaneously herewith.
7. The Debtors move was precipitated by their inability to maintain their regular monthly expenses, including, but not limited to, mortgage, vehicle, trustee, home

maintenance and other related household expenses, therefore the move to 4313 Deer Path Lane was necessitated.

8. The Debtors are desirous of continuing their Chapter 13 Bankruptcy and have about 42 months remaining.

9. Through the Modified Chapter 13 Bankruptcy Plan, the Debtors are desirous of surrendering their residential real estate located and known as 1392 Arundel Way, Bensalem, PA 19020, surrendering their vehicles, and paying their IRS and unsecured debts in full.

WHEREFORE, for the reasons stated herein, the Debtors respectfully request that this Honorable Court Reconsider its March 21, 2019 Order Dismissing the instant matter and allow the Chapter 13 Plan to be Modified as filed.

Respectfully submitted,

Dated: March 26, 2019

/s/ Brad J. Sadek, Esquire  
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